

OAo submission on EA's work on Ensuring an Orderly Thermal Transition

Kia ora,

This brief submission on behalf of Oxfam Aotearoa is limited to commenting on the desired outcome of the Electricity Authority's work on Ensuring an Orderly Thermal Transition. The desired outcome identified in the consultation paper reads:

The desired outcome of this workstream is that the right (efficient) level and type of thermal generation capacity is available during the transition to a renewables-based system. This should avoid the adverse outcomes of poor reliability (if there is insufficient back-up resource such as thermal generation) or excessive costs and emissions (if there is too much thermal generation).

The desired outcome should explicitly identify lowering emissions from electricity generation as a primary goal of the workstream, through supporting the transition to renewable electricity generation, alongside maintaining reliable electricity supply.

As currently drafted, the desired outcome conflates the status quo activity (thermal generation) with one desired outcome (reliable electricity supply), while treating the other desired outcome of emissions reduction only as a background part of the policy context.

Oxfam Aotearoa supports New Zealand taking greater action to reduce our domestic emissions, including in the energy sector. This will enable New Zealand to meet our international commitments, including our Nationally Determined Contribution under the Paris Agreement. Meeting our NDC through domestic emissions reductions has the benefit of avoiding, or at least reducing, reliance on expensive international offsets, which are potentially expensive and pose risks, including for the integrity of emissions reductions.

We call on the Electricity Authority to take a leading role in supporting the effort to reduce emissions within the energy sector, including by identifying emissions reduction as a desired outcome of the Authority's work on electricity system transition.

To support this desired outcome, we would expect the Electricity Authority to focus on identifying and meeting the needs of the electricity sector to enable a full transition away from fossil fuel use: to renewable and low emissions electricity generation, with a full, fair and fast phase-out of gas- and coal-fired thermal generation.

While we have limited our submission to comment on the desired outcome of the workstream, this will necessarily have implications throughout the proposals. We urge the Authority to work through these implications and make adjustments to the work plan in fit with a desired outcome of reducing emissions. We expect that other groups will have greater capacity to submit in more detail on this.

Thank you for the opportunity to submit on this work.

Ngā mihi,
Nick

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My normal work days are Monday to Thursday.

